

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
CHATTANOOGA DIVISION**

ECOLAB INC., and NALCO COMPANY,  
LLC d/b/a Nalco Water, an Ecolab Company  
and/or Nalco Water,

Plaintiffs,

v.

ANTHONY RIDLEY,

Defendant.

No. 1:22-cv-00050-TRM-CHS

District Judge Travis R. McDonough

Magistrate Judge Christopher H. Steger

**PLAINTIFFS' DEPOSITION DESIGNATIONS**

Plaintiffs Ecolab Inc. (“Ecolab”) and Nalco Company LLC d/b/a Nalco Water, an Ecolab Company and/or Nalco Water (“Nalco”) (jointly referred to as “Nalco/Ecolab” or “Plaintiffs”), by and through their counsel, hereby designate the following portions from deposition testimony for use at the hearing in this matter, either to offer substantive evidence or rebuttal evidence. By designating these specific portions of deposition testimony, Plaintiffs do not waive the right to offer additional portions of deposition testimony for purposes of rebuttal and/or impeachment. Plaintiffs also reserve the right, upon good cause shown, to further supplement these designations.

**JOHN ALCORN – March 28, 2023, Deposition**

Plaintiffs designate the following portions of John Alcorn's deposition to be used during the trial of this matter:

Pages/Lines	Defendant's Objections	Defendant's Counter-Designations	Plaintiffs' Objections to Defendant's Counter-Designations
14:4–17:2			
17:10–18:21			
20:1–21:11			
22:7–25			
24:6–30:19			
31:7–34:8			
37:20–21			
40:21–44:9			
44:20–47:24			
48:7–49:22			
50:10–19			
54:10–56:21			
57:2–58:3			
60:20–61:23			
62:11–65:14			
66:24–83:24			
84:10–84:21			
86:16–88:14			
89:8–90:2			
91:6–95:17			
96:3–9			
96:16–99:4			
99:10–100:23			
104:8–23			
117:20–22			
121:1–122:23			
124:13–125:1			
125:24–129:10			

<b>Pages/Lines</b>	<b>Defendant's Objections</b>	<b>Defendant's Counter-Designations</b>	<b>Plaintiffs' Objections to Defendant's Counter-Designations</b>
129:12–19			
130:14–18			
131:4–134:12			
138:21–139:2			
139:17–140:4			
144:22–145:13			
146:20–150:2			
150:11–151:16			
155:19–156:20			
157:2–23			
158:23–159:23			
165:21–168:17			
172:5–173:23			
181:17–182:7			
183:5–189:3			

**RICHARD CISSELL – April 6, 2023 Deposition**

Plaintiffs designate the following portions of Richard Cissell's deposition to be used during the trial of this matter:

<b>Pages/Lines</b>	<b>Defendant's Objections</b>	<b>Defendant's Counter-Designations</b>	<b>Plaintiffs' Objections to Defendant's Counter-Designations</b>
14:5–14			
23:5–25:18			
26:9–12			
26:20–23			
27:21–28:9			
31:21–32:1			
32:18–33:12			
34:4–35:2			
93:5–94:2			
98:2–10			
100:13–102:24			
106:19–104:12			
105:11–106:3			
108:1–11			
108:24–110:9			
110:21–113:5			
148:25–149:25			
154:3–20			
155:7–17			
172:2–5			
172:14–21			
173:7–18			
175:10–13			
176:24–177:4			
177:17–178:18			
186:1–10			
188:24–17			
190:4–15			

<b>Pages/Lines</b>	<b>Defendant's Objections</b>	<b>Defendant's Counter-Designations</b>	<b>Plaintiffs' Objections to Defendant's Counter-Designations</b>
194:16–19			

## **HELEN HAMILTON – April 12, 2023 Deposition**

Plaintiffs designate the following portions of Helen Hamilton's deposition to be used during the trial of this matter:

<b>Pages/Lines</b>	<b>Defendant's Objections</b>	<b>Defendant's Counter-Designations</b>	<b>Plaintiffs' Objections to Defendant's Counter-Designations</b>
14:3–27:14			
27:16–28:5			
30:8–31:2			
32:10–38:9			
42:24–44:8			
45:21–63:6			
63:7–11			
70:10–73:14			
73:16–74:6			
76:6–80:16			
14:3–27:14			
27:16–28:5			
30:8–31:2			
32:10–38:9			
42:24–44:8			
45:21–63:6			
63:7–11			
70:10–73:14			
73:16–74:6			
76:6–80:16			
82:3–8			
83:15–84:20			
86:3–89:5			
90:4–91:18			
92:20–93:1			
95:4–18			
97:13–22			
98:1–100:2			

<b>Pages/Lines</b>	<b>Defendant's Objections</b>	<b>Defendant's Counter-Designations</b>	<b>Plaintiffs' Objections to Defendant's Counter-Designations</b>
100:24–102:17			
104:9–18			
105:8–18			
106:10–107:3			
107:11–108:5			
108:19–109:18			
113:6–115:10			
117:8–14			
126:1–128:13			
129:6–130:14			
131:2–132:14			
134:21–135:5			
135:14–138:8			
139:6–17			
141:17–142:9			
143:17–145:4			
148:16–149:8			
150:8–151:17			
152:6–14			
155:8–157:7			
157:24–159:19			
160:9–163:21			
165:18–178:9			
180:17–184:9			
187:18–23			
188:5–22			
190:23–191:15			
192:21–194:7			
195:2–196:3			
197:13–19			
199:19–24			
202:13–204:6			
205:13–207:4			

Pages/Lines	Defendant's Objections	Defendant's Counter- Designations	Plaintiffs' Objections to Defendant's Counter- Designations
211:21–24			

**BENJAMIN IRWIN – March 1, 2023 Deposition**

Plaintiffs designate the following portions of Benjamin Irwin's deposition to be used during the trial of this matter:

Pages/Lines	Defendant's Objections	Defendant's Counter-Designations	Plaintiffs' Objections to Defendant's Counter-Designations
6:12–7:9			
8:5–9:17			
12:15–20			
21:8–25:19			
29:4–33:10			
51:6–54:8			
54:12–15			
56:9–57:22			
62:25–66:11			
66:14–67:22			
69:4–8			
79:23–80:1			
94:5–17			
104:2–13			
121:24–122:9			
123:9–124:1			
129:21–131:19			
134:23–136:20			
137:13–24			
144:8–150:25			
151:14–19			
169:13–170:3			
173:6–174:1			
180:15–23			
184:12–185:2			
185:18–186:7			
190:6–25			
193:17–195:5			

<b>Pages/Lines</b>	<b>Defendant's Objections</b>	<b>Defendant's Counter-Designations</b>	<b>Plaintiffs' Objections to Defendant's Counter-Designations</b>
195:13–198:13			
208:11–209:24			
216:2–19			
233:15–234:15			

**LYNNE JAMES – March 8, 2023 Deposition**

Plaintiffs designate the following portions of Lynne James's deposition to be used during the trial of this matter:

<b>Pages/Lines</b>	<b>Defendant's Objections</b>	<b>Defendant's Counter-Designations</b>	<b>Plaintiffs' Objections to Defendant's Counter-Designations</b>
12:9–13:11			
14:1–15:9			
17:13–19			
17:20–18:13			
19:7–22:7			
22:16–20			
25:7–24			
26:10–28:1			
30:15–19			
32:19–34:21			
35:4–23			
36:23–37:8			
37:22–38:3			
41:7–42:24			
53:4–14			
60:22–61:25			
62:11–23			

## **STEVE LEAVELL – March 16, 2023 Deposition**

Plaintiffs designate the following portions of Steve Leavell's deposition to be used during the trial of this matter:

<b>Pages/Lines</b>	<b>Defendant's Objections</b>	<b>Defendant's Counter-Designations</b>	<b>Plaintiffs' Objections to Defendant's Counter-Designations</b>
10:3–7			
10:16–22			
18:9–14			
18:20–19:8			
19:20–20:17			
21:4–20			
25:16–26:9			
26:20–27:14			
28:5–22			
30:11–17			
31:8–32:3			
34:4–14			
36:9–37:19			
38:6–39:19			
40:12–20			
41:10–42:4			
43:4–15			
44:7–10			
45:2–17			
47:9–16			
49:14–19			
52:8–14			
53:11–54:17			
54:22–55:5			
56:11–17			
57:21–58:11			
71:5–17			
84:7–85:17			

<b>Pages/Lines</b>	<b>Defendant's Objections</b>	<b>Defendant's Counter-Designations</b>	<b>Plaintiffs' Objections to Defendant's Counter-Designations</b>
86:10–87:11			
93:14–95:3			
95:17–96:14			
103:4–22			
110:18–111:9			
118:9–119:2			
121:17–122:7			
122:12–16			
123:5–124:4			
126:21–127:11			
133:17–134:8			
134:19–135:4			
148:9–15			
148:19–149:10			
149:20–150:7			
154:5–155:10			
155:22–156:11			
157:14–21			
167:17–169:4			
169:20–170:7			
171:11–172:3			
172:15–18			
174:3–19			
185:5–187:12			
190:12–16			
191:1–7			
192:18–194:12			
205:14–207:2			
210:17–211:7			
214:12–15			
225:14–17			
227:3–19			
230:16–231:6			

<b>Pages/Lines</b>	<b>Defendant's Objections</b>	<b>Defendant's Counter-Designations</b>	<b>Plaintiffs' Objections to Defendant's Counter-Designations</b>
234:16–235:20			
236:12–18			
238:9–20			

## **KARRY MACKIE – March 1, 2023 Deposition**

Plaintiffs designate the following portions of Karry Mackie's deposition to be used during the trial of this matter:

<b>Pages/Lines</b>	<b>Defendant's Objections</b>	<b>Defendant's Counter-Designations</b>	<b>Plaintiffs' Objections to Defendant's Counter-Designations</b>
7:12–11:9			
12:21–13:3			
14:2–9			
18:8–10			
19:17–20:1			
20:10–20			
127:23–129:23			
136:9–137:17			
138:1–139:16			
143:3–18			
149:2–9			
175:15–19			
176:19–177:17			
182:2–183:4			
190:1–22			
202:8–203:12			
208:13–214:1			
216:1–218:1			
218:19–221:5			
221:19–222:10			
230:5–17			
237:19–238:2			
241:13–243:12			
264:11–265:6			
268:7–270:17			
277:17–278:9			
286:18–287:9			
310:5–311:12			

<b>Pages/Lines</b>	<b>Defendant's Objections</b>	<b>Defendant's Counter-Designations</b>	<b>Plaintiffs' Objections to Defendant's Counter-Designations</b>
312:19–313:13			
324:7–23			
326:13–20			
328:3–13			
330:22–331:12			
333:3–336:1			
336:12–340:3			
340:9–341:11			
343:11–346:13			
347:7–23			

**PETE MUMPOWER – March 8, 2023 Deposition**

Plaintiffs designate the following portions of Pete Mumpower's deposition to be used during the trial of this matter:

Pages/Lines	Defendant's Objections	Defendant's Counter-Designations	Plaintiffs' Objections to Defendant's Counter-Designations
11:7–9			
11:23–13:11			
13:16–14:13			
16:4–17:17			
18:1–19:6			
24:6–10			
24:15–21			
26:5–27:6			
27:16–28:16			
28:17–29:16			
30:13–15			
32:4–14			
35:8–14			
37:15–39:17			
40:7–41:10			

Dated this 1st day of April 2024.

Respectfully submitted,

ECOLAB INC. NALCO COMPANY, LLC  
d/b/a Nalco Water, an Ecolab Company  
and/or Nalco Water,

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**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic receipt. Parties may access this filing through the Court's electronic filing system.

/s/ David Yoshimura

David Yoshimura